



Corporate Sustainability Policy

CEO
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1. Purpose

The purpose of URBASER's Corporate Sustainability Policy is to define the action framework for the sustainability practices assumed by the Company and integrate social responsibility into the Company's business model and strategy.

URBASER's business model has the objective of creating value for the communities where the Company operates and provide high-quality services in a sustainable way for the public, customers and shareholders, while protecting the environment. URBASER incorporates technology into its processes and optimises the resources used, relying on the necessary specialist support from its professionals, to benchmark the provision of environmental services.

Sustainability is understood as the sustainable undertaking that URBASER makes in the Company's dealings with main stakeholders by incorporating ethics, good governance, environmental protection and the creation of social value into its business model. At URBASER the term "stakeholders" is understood to be all persons, entities and groups on whom the Company's activities have an impact or effect, including suppliers and contractors, customers, employees, shareholders, regulatory bodies, financial institutions and local communities.

URBASER understands CSR as a long-term commitment to strengthen the principle of economic and financial solidity. The Corporate Social Responsibility Policy develops a set of action principles that will be realised as targets and indicators to make up URBASER's Sustainability Action Plan.

2. Scope of application

This Policy is applicable to all employees, managers and members of the governing bodies of URBASER S.A., its subsidiaries and holdings/joint ventures in which URBASER is the majority shareholder/partner or where control is held by URBASER's management ("URBASER" or "the Company"). It is the responsibility of all URBASER employees to act professionally and protect the Company's reputation.

3. Contents

Four areas of Sustainability management at URBASER have been defined:

Ethics and Corporate Governance

- URBASER will monitor the compliance and necessary communication of the requirements and practices described in its Code of Conduct and the associated documents and standards, which regulate ethics and good governance within the Company.
- URBASER will adopt the most demanding requirements with regard to corporate governance, integrity and ethics in business, anticipating regulatory demands and observing international best practices of good governance.
- URBASER will provide its stakeholders with the whistle-blower channels to report any situations that may fall outside the framework of the Company's Code of Conduct and the Corporate Sustainability Policy.
- URBASER will carry out periodical reporting to its stakeholders, in a transparent and accurate way, mainly through an annual report including information on the status of compliance with these principles.
- URBASER will ensure that risk prevention is appropriately measured and managed, minimising negative impact and maximising positive impact.

Innovation for sustainable environmental management

- URBASER will pursue its business minimising its environmental impact and considering operational efficiency, resources consumption reduction and climate change mitigation in the context of its processes.
- The Company will protect and preserve the biodiversity of the ecosystems where it operates, implementing the necessary processes to prevent the emission of gases and spills.
- URBASER will foster the uptake of circular economy by incorporating sub-products into production processes and encouraging the use of recycled materials.
- The Company will monitor compliance and communication of the requirements and practices described in its Corporate Quality, Health, Safety, Environment and Energy Policy and its Corporate Research and Development Policy and the associated documents and standards, which regulate the Company's environmental and innovation practices.
- URBASER will strengthen innovation processes within the Company to reduce its environmental and social impact and improve the quality of services and efficiency of processes.

Responsible value chain

- Through the Suppliers Code of Ethics, URBASER will convey CSR values across the Company and at all organisational levels, to its supply chain, partners and other stakeholders.
- URBASER will actively listen to and maintain open dialogue with its stakeholders, taking their expectations into consideration and responding to them, incorporating the most relevant ones into its CSR and business strategy.
- URBASER will provide an appropriate environment for all employees to facilitate career development, promote talent and ensure that the necessary resources are available to foster innovation and workers' active participation.
- URBASER will foster respect for diversity and fair treatment, applying HR standards to guarantee equal opportunities in the recruitment and promotion of employees, considering diversity as an enriching cultural value of the workforce.
- The Company will respect and value employees' local roots in the communities where it operates by prioritising local recruitment.
- The Company will monitor the compliance and necessary communication of the requirements and practices described in the Gender Equality Plans, which regulate the Company's management practices related to equality and diversity.
- URBASER will provide the necessary resources and conditions to foster a culture of health and safety among its employees, the citizens and its contractors.
- The Company will monitor the compliance and necessary communication of the requirements and practices described in the Corporate Quality, Health, Safety, Environment and Energy Policy and the associated documents and standards, regulating Occupational Health and Safety practices and quality of the services within the Company.
- URBASER will reject any form of abuse or infringement of human rights among its employees, suppliers, contractors, partners and competitors or the society in general.
- URBASER will maintain open, honest communication with respect to the services provided, facilitating the information that customers require under the relevant contracts and ensuring that the necessary mechanisms are applied to protect the data privacy of the customers, in accordance with the law.
- The Company will promote two-way communication with the users of its products and services, improving the quality and immediacy of the service provided and responding to their expectations. When designing services, URBASER will consider, when applicable, accessibility criteria for the citizens, promoting the integration of people at social exclusion risk.
- The Company will foster the adoption of responsible practices for management of the supply chain, through the Corporate Procurement Policy and the Suppliers Code of Ethics, where the Company's principles and values are shared.

Contributing to communities

- URBASER will work towards creating value on the communities, through high-quality employment, knowledge generation, technology transfer to other geographical areas, and a working culture that is based on ethics and employees' integrity.
- URBASER will foster stable relationships with the communities where the Company operates, strengthening relationships of trust with institutional clients, providing solvency and credibility and quality services to citizens.
- The Company will align its social action activities with its vocation to serve citizens, thus configuring its three social action axes:
 - Environmental awareness and education.
 - Voluntary and disinterested actions for the benefit of the Communities.
 - Support for the arts, culture and sports.

URBASER's social action is framed within these three areas of action, and may be materialized through the support deemed appropriate and in accordance with the ethical principles of the Company.

- URBASER will ensure transparency in the selection and impartiality in the decision, applying the duty of diligence in the analysis of opportunities for social action.
- URBASER will guarantee the unconditionality of collaboration, developing actions that contribute to the progress of its stakeholders.
- The Company will safeguard the due control of the contributions made, through the application of control mechanisms that allow traceability and thus ensure compliance with the commitments set out in this Policy. Those responsible for ensuring compliance with the law and the internal rules of application will be the people involved in the process of selection and monitoring of the actions and contributions made.

4. Training

URBASER will promote due training for all Company personnel, in accordance with their level of exposure to risk, so that they are aware of their ethical principles and duties derived from the Code of Conduct and this Policy.

5. Doubts, communications, or complaints

Any employee who has doubts or well-founded suspicions of non-compliance with the provisions of this Policy, the Code of Conduct, or any related procedure, as well as doubts about the application of this Policy, should contact the corresponding Regulatory Compliance Body through the Ethical channel provided on the URBASER website, www.urbaser.com.

The Ethical Channel is a means of reporting non-compliance with the rules contained in this Policy, as well as a means of resolving any doubts that may arise from its application.

6. Non-compliance

This Policy is a mandatory rule, and therefore its violation will constitute a breach and the Company will adopt the appropriate disciplinary measures, in accordance with labour legislation and the Penalty Procedure contained in the applicable Collective Bargaining Agreement, if applicable, without prejudice to any other responsibilities that the offender may have incurred. Likewise, URBASER will reserve the right to adopt the measures it considers appropriate against the business partners who do not comply with it.

7. Review and updating

The Chief Compliance Officer shall periodically review the content of this Corporate Policy, ensuring that it reflects the international recommendations and best practices in force at any given time, and shall propose to the Board of Directors the modifications and updates that contribute to its development and continuous improvement.



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